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10 UNITED STATES BANKRUPTCY COURT

11 DISTRICT OF NEVADA

12 In re:

13 SEMION KRONENFELD
14 (Canadian Case No. 31-1297500)

15 Debtor in a foreign proceeding.

16 Case No.: 14-10736 ABL

17 Chapter 15

18 DECLARATION OF SEMION KRONENFELD
19 IN SUPPORT OF VERIFIED PETITION UNDER
20 CHAPTER 15 FOR RECOGNITION OF A
21 FOREIGN PROCEEDING

22 I, Semion Kronenfeld, pursuant to 28 U.S.C. §1746, hereby declare as follows:

23 1. I am over the age of 18 and, if called upon, could completely testify to all matters
24 set forth in this statement based upon my own personal knowledge except for those portions
25 specified as being otherwise. I make this declaration in connection with the Verified Petition
Under Chapter 15 for Recognition of A Foreign Proceeding ("Petition").

26 2. I am the Debtor in Canadian Bankruptcy Case No. 31-1297500. I am authorized
27 to appear in this court as the foreign representative in this case. A true and correct copy of the
28 Certificate of Filing of A Notice of Intention To Make A Proposal is attached hereto as Exhibit 1.

29 3. By the Petition, I seek this Court's recognition of my bankruptcy proceeding as
30 pending in Canada and supervised by the Canadian Court pursuant to subsections 50.4(1) of the
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1 Bankruptcy and Insolvency Act as a "foreign main proceeding" under Sections 1502(4), 1504,
2 1515, 1517 of the Bankruptcy Code.

3 4. I operated several businesses and owned real estate for many years. During those
4 years I was treated as a vip at American and Canadian casinos. I was provided markers and
5 always repaid them.

6 5. This treatment led to a gambling addiction which I suffer from even today and am
7 currently in treatment.

8 6. In 2008-2009, the worldwide financial market crashed and my properties became
9 worth less than the debt service. My business ventures went under and Royal Bank froze my
10 assets. I was unable to pay my gambling markers. Despite this problem, several casinos
11 continued to feed my gambling addiction by providing additional markers.

12 7. On December 8, 2009, I filed a Notice of Intention to Make a Proposal attached as
13 Exhibit 1 to my declaration.

14 8. The foreign proceeding is a voluntary proceeding pursuant to the Notice of
15 Intention to Make a Proposal on December 8, 2009 under subsection 50.4(1) of the Bankruptcy
16 and Insolvency Act ("Canadian Proceeding"). That foreign proceeding is the only proceeding
17 with respect to my assets and debts.

18 9. Several American Casinos were named as creditors in the bankruptcy and filed
19 claims or participated in the bankruptcy, ultimately receiving a percentage of the amounts owed.

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10. However, the American Casinos continue to pursue debt collection means and this Chapter 15 petition is necessary in order to enforce the discharge in the Canadian Proceeding.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Dated this 26 day of February, 2014.

Semion Kronenfeld

9. If the Court determines that Canada is not the center of main interests, and therefore the case commenced by this chapter 15 Petition is not treated as a foreign main proceeding, it is respectfully requested the Court entertain the Petition as one seeking recognition of, and relief respecting, a foreign non-main proceeding, as defined in Section 1502(5) of the Bankruptcy Code, as the Company has an establishment, as defined by Section 1502(2) of the Bankruptcy Code, located in Canada.

IN WITNESS WHEREOF, I have executed this Statement under penalty of perjury under the laws of the United States of America this 06 day of February, 2014.

1 Semion Kronenfeld
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